

## REMARKS

Claims 1-28 are pending in the present Application. Reconsideration and allowance of the claims are respectfully requested in view of the following remarks.

### **First Claim Rejection Under 35 U.S.C. § 103(a)**

Claims 1-4, 6, 8, 9, 11-16, 18-26, and 28 are rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over Son et al. ("Automatic Generation of Simulation Models from Neutral Libraries: An Example", Proceedings of the 2000 Winter Simulation Conference", Volume 2, pages 1558-1567, Orlando, FL. December 2000) in view of Kosiba et al. (US Patent 7,103,562), further in view of "Neutral Template Libraries for Efficient Distributed Simulation within a Manufacturing System Engineering Platform" by Kai Mertins, Markus Rube, and Frank-Walter Jaekel (hereafter referred to as Mertins). Applicants respectfully traverse this rejection.

Applicants respectfully contend, that Son et al. in view of Kosiba et al. and in further view of Mertins does not show, teach, or suggest, a database as recited in claim 1, a model as recited in claim 1, and an allocation as recited in claim 1.

The Examiner suggests that the "Library of Simulation Objects For all applications" of Son et al. (see Figure 1) teaches the database as recited in claim 1. However, the database, according to claim 1, stores a plurality of models, stores a plurality of model objects, AND stores allocations. At best, Son et al. teach only storing objects in the Library. (page 1558, right column, second paragraph) The templates of Son et al. are retrieved from Promodel, a different system not the Library (see, e.g., page 1564, section 5.1) and Son et al. simply fails to disclose allocations (as will be discussed in more detail below). Thus, Son et al. fails to show, teach, or suggest a database that stores a plurality of models, that stores a plurality of model objects, and that stores allocations. Applicants respectfully contend that Kosiba et al. and Mertins fail to show, teach, or suggest this deficiency of Son et al.

The Examiner further suggests that the simulation model of Son et al. teaches the model

as recited in claim 1. However, the model according to claim 1 is associated with a template having a plurality of tables representative of ... one or more entity, task, and resource parameters.

Son et al., in contrast, teach a model that is associated with a plurality of tables (page 1562, section 4.2; Figure 3) and where each table is associated with a plurality of templates. Thus, Son et al. teaches using a plurality of templates to define the model, whereas claim 1 recites a single template that is associated with the model. Thus, Son et al. does not show, teach, or suggest a model associated with a template having a plurality of tables. Applicants respectfully contend that Kosiba et al. and Mertins fail to show, teach, or suggest this deficiency of Son et al.

The Examiner further suggests that the capacity data element of the shop floor information object of Son et al. (page 1560) teaches the allocation as recited in claim 1. However, the capacity is a data value defining capacity characteristics of a station. (page 1560) In contrast, an allocation, as defined in paragraph [0066] of the present application, is a designation or an assignment of a model to a resource. Thus, Applicants respectfully contend that an allocation is not the same thing as a capacity. Thus, Son et al. does not show, teach, or suggest an allocation as recited in claim 1. Further, because Son et al. does not show, teach, or suggest an allocation, Son et al. does not show teach or suggest a model application that performs allocations of the one or more entity, task, and resource parameters. Applicants respectfully contend that Kosiba et al. and Mertins fail to show, teach, or suggest this deficiency of Son et al.

For at least the reasons stated above, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1.

Claims 2-4, 6, 8, and 9, depend from claim 1 and are patentable at least due to their dependency on claim 1. Claims 11, 18, and 21 contain elements that are similar to claim 1 and are patentable for at least the same reasons that claim 1 is patentable. Claims 12-16 and depend from claim 11 and are patentable at least due to their dependency on claim 11. Claims 19-20 depend from claim 18 and are patentable at least due to their dependency on claim 18. Claims 22-26 and 28 depend from claim 21 and are patentable at least due to their dependency on claim 21. Thus, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 2-4, 6, 8, 9, 11-16, 18-26 and 28.

**Second Claim Rejection Under 35 U.S.C. § 103(a)**

Claims 5, 7, 10, 17 and 27 are rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over Son et al in view of Kosiba et al, further in view of Mertins, as applied to claims 1, 11 and 21 above, and further in view of Fontana et al (US Patent 6, 167, 564). Applicants respectfully traverse this rejection.

Applicants respectfully submit that claims 5, 7, and 10 depend from claim 1 and are non-obvious over Son et al in view of Kosiba and Mertin for at least the reasons advanced with reference to claim 1. Claim 17 depends from claim 11 and is non-obvious over Son et al. in view of Kosiba and Mertin for at least the reasons advanced with reference to claim 1. Claim 27 depends from claim 21 and is non-obvious over Son et al in view of Kosiba and Mertin for at least the reasons advanced with reference to claim 1. For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 5, 7, 10, 17, and 27.

**Conclusion**

In view of the foregoing remarks, Applicants submit that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

In the event the Examiner has any queries regarding the instantly submitted response, the undersigned respectfully request the courtesy of a telephone conference to discuss any matters in need of attention.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 07-0868.

Respectfully submitted,

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